

February 16, 2005

Ms. Francine Torres, Administrator
USDA-AMS-TMP-NOP
1400 Independence Avenue, SW., Room 4008-So, AG Stop 0268
Washington, D.C. 20250-0200

RE: Pasturing of Organic Dairy Cows

Dear Ms. Torres,

As a firm believer in the "organic" label and what most consumers believe it represents I would like to express my strong support for the recommendations from the National Organic Standards Board Livestock Committee from February 1, 2005 regarding pasture requirements for the National Organic Program.

I believe that the label "organic" implies certain standards that contribute to the well being of the consumer, the animals and the earth. I do not believe that confinement of dairy cows or other animals should be allowed under the "organic" banner. This does not contribute to the well being of the animal and I personally do not wish to consume products that have caused inordinate suffering to the animal.

Just as humans need fresh food, clean water and fresh air to be our healthiest selves, so the animals would need less medical intervention and be healthy and happier (less stressed and strengthened immune systems) overall if they were allowed to have access to pasture.

Animals utilizing pasture naturally avoid the concentration of manure issues associated with dry lot production. Allowing the cows to go to their food rather than bringing feed to the cows' means less use of machinery and non-renewable resources.

For these reasons, I would like to support the Livestock Committee's recommendation that grazed feed must provide a significant portion of the total feed requirements. I firmly believe that lactation of dairy animals is not a stage of production under which animals may be denied pasture for grazing. I would like to see these recommendations be incorporated into the standards as mandated production practices

Thank you.

Sincerely,



Carolyn Ferrell
32 Church Road
Airmont NY 10952